



## State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott McCallum, Governor  
Darrell Bazzell, Secretary

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January 18, 2002

Sally Shaver, Director  
Emission Standards Division  
USEPA - C504-03  
RTP, NC 27711

Subject: Electric Utility MACT

Dear Ms. Shaver:

In June 2001 the Wisconsin Department of Natural Resources proposed a regulation that would limit mercury air emissions from sources in the state including coal-fired electric utilities. We are members of a citizens committee that has been assembled by WDNR Secretary Bazzell to provide him recommendations for addressing controversial areas identified in public comments received during the WDNR rules hearing process. The WDNR is planning on seeking rule adoption this spring.

For coal-fire electric utilities, the proposed rules contain a phased mercury emission reduction schedule covering a fifteen-year period for four major electric utilities in Wisconsin. Five years after promulgation, a 30% reduction in baseline mercury emissions must be achieved by each major utility. A 50% reduction in baseline emissions is required after ten years, and a final reduction of 90% is to be achieved after fifteen years. We are interested in the interaction between a Wisconsin mercury regulation and the electric utility MACT that the United States Environmental Protection Agency is currently developing.

We are hopeful that we can have a representative from USEPA participate at one of our future meetings, February 13, 26 or March 6, 2002. In addition to an opportunity to engage in a general discussion on the utility MACT we are interested in the following specific information:

- Overview of the MACT standard setting process.
- Utility MACT development and implementation schedule.
- How MACT will be determined for electric utilities in Wisconsin.
- What mercury control technologies might be considered in the utility MACT.

Please contact Jon Heinrich, Bureau of Air Management concerning our request. He can be reached at 608-267-7547. Thank you for your consideration.

Sincerely,

Steve Hiniker, Executive Director  
Citizens Utility Board

Dave Hoopman, Director of Regulatory issues  
Wisconsin Federation of Cooperatives

Ann McCammon-Soltis  
Great Lakes Indian Fish & Wildlife  
Commission

Bill McClenahan  
Forest County Potawatomi

Scott Meske, Government Affairs Director  
Municipal Electric Utilities of Wisconsin

Annabeth Reitter, StoraEnso North America  
representing the Wisconsin Paper Council

Keith Reopelle, Program Director  
Wisconsin's Environmental Decade

Russ Ruland  
The Muskellunge Club of Wisconsin

Jeff Schoepke, Director of  
Environmental Policy  
Wisconsin Manufacturers and Commerce

Joe Shefchek, Managing Director Environmental Health  
and Safety, Alliant Energy

William R. Skewes, Executive Director  
Wisconsin Utilities Association

Kathleen Standen, Manager, Environmental  
Regulatory Advocacy, Wisconsin Electric /  
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Wayne Stroessner  
Random Lake Association

Eric Uram  
Sierra Club Midwest Office

Jim Wise, ECCOLA – Environmentally Concerned  
Citizens of Lakeland Areas